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Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:	Bankruptcy No. 24-23530 WTT
AMMON EDWARD BUNDY	Chapter 7
Debtor.	Honorable William T. Thurman

**DECLARATION OF ENGELS TEJEDA SHOWING CAUSE FOR ENTRY OF THE
PROPOSED ORDER GRANTING ST. LUKE'S CREDITORS' MOTION TO
POSTOPONE DEADLINE TO OBJECT TO THE DISCHARGE UNDER
11 U.S.C. § 727**

I, Engels Tejeda, declare and state as follows:

1. I am a partner in the Salt Lake City office of Holland & Hart LLP and am licensed to practice law in the State of Utah. Along with my colleagues identified above, I am counsel for

St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively, the "St. Luke's Creditors"). I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

2. I submit this Declaration in to show cause for entry of the Pending Proposed Order Granting St. Luke Creditors' Second Motion to Extend Deadline to File a Complaint Objecting to Discharge Under 11 U.S.C. § 727 (the "Proposed Order") [Dkt. 378], and in response to the Court's Order to Show Cause regarding the Proposed Order [Dkt. 374].

3. On February 5, 2025, the Court held a hearing (the "Hearing") on the St. Luke's Creditors' Second Motion to Extend the Deadline to File a Complaint Objecting to the Discharge Under 11 U.S.C. § 727 (the "Motion") [Dkt. 308].

4. At the Hearing, the Court made its findings of facts and conclusions of law granting the Motion and instructed counsel for the St. Luke's Creditors to submit a corresponding proposed order.

5. On that same day, February 5, 2025, I caused the Proposed Order to be served via email and first-class mail, U.S. postage pre-paid, upon Debtor Ammon E. Bundy. A copy of the transmittal email is attached as **Exhibit A**. *See also*, certificate of service attached to the Proposed Order.

6. The St. Luke's Creditors did not file the Proposed Order to afford the Debtor seven days to respond with any proposed changes to the same.

7. Having received no objections to the form of the Proposed Order within 7 days – by February 12, 2025, the St. Luke’s Creditors uploaded the Proposed Order on February 13, 2025 as Dkt. 378.

8. WHEREFORE, the St. Luke’s Creditors respectfully request that the Proposed Order be entered as the delay in submission was meant to afford the Debtor an opportunity to object to the form of the order and no prejudice was caused by the delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 13th day of February, 2025.

/s/ Engels J. Tejeda

Engels J. Tejeda

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of February, 2025, I caused the foregoing to be electronically filed with the United State Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users:

Mark C. Rose
McKay, Burton & Thurman, P.C.
trustee@mbt-law.com; UT32@ecfbis.com

David W. Newman
Matthew J. Burne
U.S. Department of Justice
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U.S. Trustee
USTPRegion19.SK.ECF@usdoj.gov

George B. Hofmann
ghofmann@ck.law; mparks@ck.law

AND I FURTHER CERTIFY that on such date I served the foregoing on the following non-CM/ECF Registered Participants by email at aebundy@bundyfarms.com and First Class U.S. Mail, with postage prepaid, addressed as follows:

Ammon Edward Bundy, *pro se*
P.O. Box 1062
Cedar City, UT 84721-0991

Ammon Edward Bundy
896 E 400 S
New Harmony, UT 84757

/s/ Engels J. Tejeda
Engels J. Tejeda
of Holland & Hart LLP

From: [Joyce J. Button](#)
To: aebundy@bundyfarms.com
Cc: [Engels J. Tejeda](#); [Erik Stidham](#)
Subject: St. Luke"s - Bundy
Date: Wednesday, February 5, 2025 5:06:39 PM
Attachments: [image001.png](#)
[Order Granting St. Luke"s-Bundy BK - Motion to Extend Time to File.pdf](#)

Please see the attached proposed Order.



**Holland
& Hart**

Joyce Button

Legal Assistant

HOLLAND & HART LLP

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CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

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Chris Roth, Natasha Erickson, M.D., and
Tracy Jungman, NP*

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ejtejeda@hollandhart.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In Re:

AMMON EDWARD BUNDY,

Debtor.

Case No. 24-23530-WTT

Chapter 7

**ORDER GRANTING ST. LUKE CREDITORS' SECOND MOTION TO EXTEND
DEADLINE TO FILE A COMPLAINT OBJECTING TO DISCHARGE UNDER 11
U.S.C. § 727; MEMORANDUM POINTS AND AUTHORITIES**

This matter came before the Court upon the Second Motion to Extend Deadline to File a Complaint Objecting to Discharge Under 11 U.S.C. § 727 (the "Motion") [Dkt. 308] filed by St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D.

Erickson, M.D., and Tracy W. Jungman, NP (the “St. Luke’s Creditors”). The Court held a hearing on the Motion on February 5, 2025, at which the St. Luke’s Creditors appeared through counsel, and the Debtor Ammon E. Bundy appeared pro se, among other parties in interest. At the Hearing, the Court made its findings of fact and conclusions of law, which are incorporated by this reference. Having considered the Motion and good cause appearing the Court,

Grants the Motion as follows;

The St. Luke’s Creditors’ deadline to object to the discharge under 11 U.S.C. § 727 shall be and hereby is extended by 60 days through April 6, 2025.

----- end of order -----

DESIGNATION OF PARTIES TO BE SERVED

Service for the foregoing Order shall be served to the parties and in the manner designated below:

By Electronic Service: I certify that the parties of record in this case as identified below are registered CM/ECF users and will be served notice of entry of the foregoing Order through the CM/ECF system:

Mark C. Rose trustee@mbt-law.com
McKay, Burton & Thurman, P.C.

U.S. Trustee USTPRegion19.SK.ECF@usdoj.gov

Darren G. Reid dgreid@hollandhart.com
Engels Tejada ejtejeda@hollandhart.com
Benjamin D. Passey bdpassey@hollandhart.com
Erik F. Stidham efstidham@hollandhart.com
Holland & Hart LLP

George b. Hofmann ghofmann@ck.law
Jeffrey Trousdale at jtrousdale@cohnekinghorn.com

By U.S. Mail / Electronic Mail: In addition to the parties of record receiving notice through the CM/ECF system, the following parties should be served Notice pursuant to Fed. R. Civ. P. 5(b).

By U.S. First Class Mail – postage prepaid:

Ammon Edward Bundy, *pro se*
P.O. Box 1062
Cedar City, UT 84721

Ammon E. Bundy
896 E 400 S
New Harmony, UT 84757

Dated: February 5, 2025.

/s/ Erik F. Stidham
Erik F. Stidham

CERTIFICATE OF SERVICE

I hereby certify that on February ___, 2025, I electronically filed the foregoing with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF user.

Matthew James Burne matthew.burne@usdoj.gov; james.gee@usdoj.gov;
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Mark C. Rose trustee@mbt-law.com; UT32@ecfcbis.com

U.S. Trustee USTPRegion19.SK.ECF@usdoj.gov

I certify that on February 5, 2025, I served the foregoing by **email and by U.S. First Class Mail with postage pre-paid to the following:**

aebundy@bundyfarms.com

Ammon Edward Bundy
P.O. Box 1062
Cedar City, UT 84721-0991

Ammon Edward Bundy
896 E 400 S
New Harmony, UT 84757

/s/ Engels Tejeda
Engels Tejeda